

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*
Case No. 1:18-op-45004

**MDL No. 2804
Case No. 17-md-2804
Hon. Judge Dan A. Polster**

**CARDINAL HEALTH, INC.'S
OBJECTIONS TO PLAINTIFFS' DEPOSITION DESIGNATIONS**

Pursuant to the Civil Jury Trial Order, ECF No. 1598, entered in *In re National Prescription Opiate Litigation* (MDL 2804) on May 1, 2019 (as amended in Judge Polster's July 29, 2019 order), Defendant Cardinal Health, Inc. submits the following Objections to Plaintiffs' Affirmative Deposition Designations. Attached as Exhibit A are Cardinal Health's objections to Plaintiffs' designations of certain deposition testimony of Steven Reardon. Attached as Exhibit B are Cardinal Health's objections to Plaintiffs' designations of certain deposition testimony of Jennifer Norris.

Because Plaintiffs have withdrawn all deposition designations to certain previously identified Cardinal Health witnesses (Eric Brantley, Todd Cameron, Christopher Forst, Mark Hartman, Steven Morse, and Gilberto Quintero), Cardinal Health is not filing objections thereto. However, if Plaintiffs were to attempt to play the depositions of these witnesses at trial

(to which Cardinal Health would object), Cardinal Health reserves the right to serve responsive designations or objections to these withdrawn depositions.

Cardinal Health further reserves all rights, including all rights to revise or withdraw Objections based on, for example, the Court's rulings, Plaintiffs' and other individual Defendants' designations of deposition testimony, and evidence introduced at trial. Consistent with prior representation by Plaintiffs' counsel that "objections and colloquy will not be proffered" by Plaintiffs, Cardinal Health has not objected to every objection or colloquy on a line-by-line basis. Cardinal Health objects to the playing of any objections or colloquy as a global matter.

Cardinal Health makes its objections pursuant to the following Objections Key:

| Code | Objection |
|-------------|---|
| 402 | Relevance. FRE 402. |
| 403 | Undue Prejudice, Confusion, Waste of Time. FRE 403. |
| 408 | Inadmissible Evidence of Settlement or Negotiations. FRE 408. |
| 602 | Lack of Foundation / Calls for Speculation. FRE 602. |
| 802 | Hearsay. FRE 802. |
| AA | Asked and Answered. FRE 611(a). |
| AF | Assumes Facts Not in Evidence. FRE 103(d), 611(a). |
| ARG | Argumentative. FRE 611(a). |
| AU | Authentication Lacking. FRE 901. |
| BER | Best Evidence Rule. FRE 1002. |
| CML | Cumulative. FRE 403, 611(a). |
| CMP | Compound Question. FRE 611(a). |
| CO | Contrary to Court Order. |
| DEM | Demonstrative Not Marked as Exhibit. FRE 103(d), 611(a). |
| HYP | Improper Hypothetical. FRE 602, 701. |
| ILO | Improper Opinion of Lay Witness. FRE 701. |
| INC | Designation Incomplete; Incomprehensible. |
| LC | Calls for a Legal Conclusion. FRE 103(d), 602, 701. |
| LDG | Leading. FRE 611(c). |
| MD | Misstates the Document. FRE 103(d), 611(a). |
| MPT | Misstates Prior Testimony. FRE 103(d), 611(a). |
| NAR | Calls for Narrative Response. FRE 103(d), 611(a). |
| NR | Nonresponsive. FRE 611(a). |
| PV | Privileged. FRE 103(d), 501, 502. |
| SCP | Outside the Scope of Designated Topics. FRE 602, 611(a)–(b); FRCP 30(b)(6). |
| SUM | Improper Summary. FRE 1006. |
| VG | Vague and ambiguous. FRE 611(a). |

Dated: October 2, 2019

Respectfully submitted,

/s/ Enu Mainigi

Enu Mainigi

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on October 2, 2019 via electronic transfer to all counsel of record, consistent with the Court's order.

/s/ Enu Mainigi
Enu Mainigi